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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JESUS MENDEZ GARCIA,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 2:25-cv-00819-RFB-DJA

**JOINT MOTION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT
[SECOND REQUEST]**

This Joint Motion is entered into by and between Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) and Plaintiff Jesus Mendez Garcia (“Plaintiff”, and together with Wells Fargo, the “Parties”), by and through their respective counsel of record, to extend Wells Fargo’s deadline to respond to Plaintiff’s Complaint from June 26, 2025 until July 14, 2025 based on the following:

1. Plaintiff filed the Complaint on May 12, 2025.
2. Plaintiff served the Summons and Complaint on Wells Fargo on May 15, 2025.
3. Based on the date of service of the Summons and Complaint, Wells Fargo’s original deadline to respond to the Complaint was June 5, 2025.
4. On May 29, 2025, the Parties filed a Stipulation to extend the deadline for Wells Fargo to respond to the Complaint until June 26, 2025 [ECF No. 6], which the Court granted. [ECF No. 8.]
5. The Parties are discussing early resolution options that may resolve all claims pled by Plaintiff against Wells Fargo. To allow the Parties sufficient opportunity to further discuss resolution options without the need to expend resources, the Parties stipulate and agree to a further

1 extension for Wells Fargo to respond to the Complaint.

2 **NOW, THEREFORE**, based on the foregoing and subject to Court approval, the Parties
3 agree as follows:

4 1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to
5 the Complaint, up to and including **July 14, 2025**, to allow the Parties sufficient time to evaluate
6 early resolution options.

7 2. This extension request is sought in good faith and is not made for the purpose of
8 delay.

9 **IT IS SO STIPULATED.**

10 Dated: June 26, 2025

Dated: June 26, 2025

11 SNELL & WILMER L.L.P.

LAW OFFICE OF KEVIN L. HERNANDEZ

12 /s/ Jennifer B. Lustig

/s/ Kevin L. Hernandez

13 Kelly H. Dove, Esq.

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Attorneys for Plaintiff Jesus Mendez Garcia

18 Las Vegas, Nevada 89135

19 *Attorneys for Defendant Wells Fargo Bank,*
20 *N.A.*

21 **ORDER**

22 Upon stipulation of the Parties, and good cause appearing therefor,

23 **IT IS HEREBY ORDERED** that Defendant Wells Fargo Bank, N.A., shall have until July
24 14, 2025 to file a response to the Complaint.

25 **IT IS SO ORDERED.**

26 Dated: 6/27/2025

27 
28 UNITED STATES MAGISTRATE JUDGE

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1 Respectfully submitted by:

2 SNELL & WILMER L.L.P.

3 /s/ Jennifer B. Lustig

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9 Las Vegas, Nevada 89135

10 *Attorneys for Defendant Wells Fargo Bank,*
11 *N.A.*

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2025 I electronically filed the foregoing **JOINT MOTION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED June 26, 2025.

/s/ Joanna Fung
An employee of SNELL & WILMER L.L.P

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